

**Transport Airplane Directorate**  
**WG Report Format**  
**Harmonization and New Projects**

**1 - BACKGROUND:**

- *This section "tells the story."*
- *It should include all the information necessary to provide context for the planned action. Only include information that is helpful in understanding the proposal – no extraneous information (e.g., no "day-by-day" description of Working Group's activities).*
- *It should provide an answer for all of the following questions:*

**a. SAFETY ISSUE ADDRESSED/STATEMENT OF THE PROBLEM**

- (1) What prompted this rulemaking activity (e.g., accident, accident investigation, NTSB recommendation, new technology, service history, etc.)? What focused our attention on the issue?
  
  
  
  
  
  
  
  
  
  
- (2) What is the underlying safety issue to be addressed in this proposal?
  
  
  
  
  
  
  
  
  
  
- (3) What is the underlying safety rationale for the requirement?
  
  
  
  
  
  
  
  
  
  
- (4) Why should the requirement exist?

**b. CURRENT STANDARDS OR MEANS TO ADDRESS**

***1. If regulations currently exist***

- (a) What are the current regulations relative to this subject? (Include both the FAR's and JAR's.)
  
  
  
  
  
  
  
  
  
  
- (b) How have the regulations been applied? (What are the current means of compliance?) If there are differences between the FAR and JAR, what are they and how has each been applied? (Include a discussion of any advisory material that currently exists.)
  
  
  
  
  
  
  
  
  
  
- (c) What has occurred since those regulations were adopted that has caused us to conclude that additional or revised regulations are necessary? Why are those regulations now inadequate?

***2. If no regulations currently exist***

- (a) What means, if any, have been used in the past to ensure that this safety issue is addressed? Has the FAA relied on issue papers? Special Conditions? Policy statements? Certification action items? If so, reproduce the applicable text from these items that is relative to this issue.
  
  
  
  
  
  
  
  
  
  
- (b) Why are those means inadequate? Why is rulemaking considered necessary (i.e., do we need a general standard instead of addressing the issue on a case-by-case basis?)

## 2. DISCUSSION

- *This section explains:*
  - *what the proposal would require,*
  - *what effect we intend the requirement to have, and*
  - *how the proposal addresses the problems identified in Background.*
- *Discuss each requirement separately. Where two or more requirements are very closely related, discuss them together.*
- *This section also should discuss alternatives considered and why each was rejected.*

### a. SECTION-BY-SECTION DESCRIPTION OF PROPOSED ACTION

- (1) What is the proposed action? Is the proposed action to introduce a new regulation, revise the existing regulation, or to take some other action?

- (2) If regulatory action is proposed, what is the text of the proposed regulation?

- (3) If this text changes current regulations, what change does it make? For each change:

- What is the reason for the change?
- What is the effect of the change?

- (4) If not answered already, how will the proposed action address (i.e., correct, eliminate) the underlying safety issue (identified previously)?

- (5) Why is the proposed action superior to the current regulations?

## **b. ALTERNATIVES CONSIDERED**

- (1) What actions did the working group consider other than the action proposed? Explain alternative ideas and dissenting opinions.
- (2) Why was each action rejected (e.g., cost/benefit? unacceptable decrease in the level of safety? lack of consensus? etc.)? Include the pros and cons associated with each alternative.

### 3. COSTS AND OTHER ISSUES THAT MUST BE CONSIDERED

*The Working Group should answer these questions to the greatest extent possible. What information is supplied can be used in the economic evaluation that the FAA must accomplish for each regulation. The more quality information that is supplied, the quicker the evaluation can be completed.*

#### **a. COSTS ASSOCIATED WITH THE PROPOSAL**

(1) Who would be affected by the proposed change? How? (Identify the parties that would be materially affected by the rule change – airplane manufacturers, airplane operators, etc.)

(2) What is the cost impact of complying with the proposed regulation? Provide any information that will assist in estimating the costs (either positive or negative) of the proposed rule.

*(For example: --*

- *What are the differences (in general terms) between current practice and the actions required by the new rule?*
- *If new tests or designs are required, how much time and costs would be associated with them?*
- *If new equipment is required, what can be reported relative to purchase, installation, and maintenance costs?*
- *In contrast, if the proposed rule relieves industry of testing or other costs, please provide any known estimate of costs.*
- *What more— or what less -- will affected parties have to do if this rule is issued?*

**NOTE:** "Cost" does not have to be stated in terms of dollars; it can be stated in terms of work-hours, downtime, etc. Include as much detail as possible.)

**b. OTHER ISSUES**

- (1) Will small businesses be affected? *(In general terms, "small businesses" are those employing 1,500 people or less. This question relates to the Regulatory Flexibility Act of 1980 and the Small Business Regulatory Enforcement Fairness Act of 1996.)*
  
- (2) Will the proposed rule require affected parties to do any new or additional recordkeeping? If so, explain. *[This question relates to the Paperwork Reduction Act of 1995.]*
  
- (3) Will the proposed rule create any unnecessary obstacles to the foreign commerce of the United States -- i.e., create barriers to international trade? *[This question relates to the Trade Agreement Act of 1979.]*
  
- (4) Will the proposed rule result in spending by State, local, or tribal governments, or by the private sector, that will be \$100 million or more in one year? *[This question relates to the Unfunded Mandates Reform Act of 1995.]*

#### **4. ADVISORY MATERIAL**

- a. Is existing FAA advisory material adequate?
  
  
  
  
  
  
  
  
  
  
- b. If not, what advisory material should be adopted? Should the existing material be revised, or should new material be provided?
  
  
  
  
  
  
  
  
  
  
- c. Insert the text of the proposed advisory material here (or attach), or summarize the information it will contain, and indicate what form it will be in (e.g., Advisory Circular, policy statement, FAA Order, etc.)

